St. Edward State Park Ballfield Improvements

SEPA Public Comments and City of Kenmore Response

The comment period on the Draft SEPA Checklist was from September 9 to September 30, 2016. A total of 35 individual comment letters were received. Comments were consolidated by topic and are responded to below.

Comment Number	Comment	Commenter Last Name(s)	Response	SEPA Document Reference
1	Washington State Parks should be the lead SEPA agency for the proposed project.	Carlson, Finn, Finley	The City of Kenmore and Washington State Parks are co-leads for this SEPA review. The City is the "nominal lead," meaning that the City is responsible for the processing of the application.	N/A
2	Impacts resulting from the ballfield project must be assessed cumulatively with the seminary proposal.	Carlson, Finley, Prince, Slayden	The cumulative impacts on traffic resulting from the ballfield improvements and lodge proposals are included in the traffic study for the ballfield proposal. Other cumulative impacts from the two proposals are addressed in the *Lodge at Saint Edward Draft EIS*.	N/A
3	The St. Edward State Park Management Plan (i.e. 'CAMP' report) states that grass fields are preferred, and that field lighting is not recommended.	Aagaard, Hendershott, Stokes, Finn	The CAMP report states that the use of natural grass fields should continue, unless subsequent assessment shows that synthetic turf has "comparable to less environmental impact, no adverse health conditions, lower operating expenses, and does not impair park management, among other considerations." Synthetic turf results in less injury to players and requires less maintenance than natural turf. In addition, as opposed to well-maintained natural turf, synthetic turf does not use fertilizers or pesticides. Non-toxic synthetic turf and infill material would be installed; crumb rubber (i.e. ground rubber from truck and automobile tires) will not be used. The CAMP reports states that field lighting is not recommended. However, since 2008 when the CAMP report was authored, lighting technology has significantly evolved. The proposed LED lighting is designed to reduce light pollution and will utilize extensive shielding to reduce the impact of glare and spill light. The use of lighting will be limited to no sooner than 3pm to no later than 9 pm, and the lease agreement is anticipated to specify that the State Parks Director will approval final lighting specifications. Additionally, native tree and shrub vegetation would be installed on the north side of the field to further buffer field lighting from the rest of the park.	N/A
4	A decline in air quality will result from the increase in traffic.	Hendershott, Carlson	St. Edward State Park receives approximately 1 million visitors per year, most of which arrive by motor vehicle. While the proposed project will increase usage of the ballfield, the potential air quality impacts generated by an increase in traffic would be minimal compared to the existing traffic in and adjacent to the park. Therefore, the resulting increase in exhaust emissions is not expected to cause a significant change in air quality over existing conditions. Additionally, the project may result in a regional net decrease in vehicle exhaust emissions. The Kenmore area currently has a lack of youth ballfields; teams often have to travel to other areas (such as Maltby and Woodinville) for practice and games in order to access available fields. Renovation of the St. Edward State Park ballfields would increase the local availability of local youth ballfields, and could therefore reduce motor vehicle use.	Section 2 (Air)
5	Significant additional carbon emissions will result from traffic, artificial turf, etc.	McKendry, Stokes, Carlson	As stated above under Comment #4, the post-project increase in exhaust emissions would be minimal compared to existing conditions. Overall, the carbon emissions from the proposed project would contribute to the cumulative carbon footprint of the City of Kenmore; no significant climate change impacts would be expected to result from the proposal. Additionally, as stated above, the proposal could result in a net decrease in vehicle carbon emissions by increasing the local availability of youth ballfields.	Section 2 (Air)

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6	Artificial turf will result in particulate and chemical migration into surface and groundwater, and turf cleaning will emit chemicals in the air.	Higson, Leon, Ericson, Hendershott, Stokes, Colton, Freedman, Hirt, Prince, Gould	No chemicals will be used in cleaning or removing items from the field. The field will be swept with a mechanical sweeper dragged behind a small "gator" utility vehicle. Water will be used to wash off anything not caught in the sweeper. Additionally, the entire field will be surrounded by a pervious concrete walk which will contain any particles used as infill in the field. The synthetic turf infill will be inert, non-toxic material. A permeable backing pad, located just under the turf, will block the turf infill from coming into contact with soil and groundwater while allowing stormwater to drain into the underground stormwater collection system. Crumb rubber infill (i.e. ground rubber from truck and automobile tires) will not be used.	Section 2 (Air) Section 3 (Water)
7	Artificial turf smells when heated.	Colton	The smell associated with synthetic turf on hot days results from the use of crumb rubber infill—no crumb infill will be used on the proposed ballfield.	Section 2 (Air)
8	Installation of artificial turf will alter water discharge patterns, and will cause hydrological impacts to the stream.	Aagaard, Leon, Carlson, Hendrickson, Hirt	The stormwater system for the proposed field was designed according to current Washington Department of Ecology stormwater standards. Overall, the system is designed to mimic pre-development conditions, in order to maintain surface and groundwater flows to the surrounding wetland and stream. The proposed synthetic turf field will be permeable to water. Directly below the turf and backing pad will be a plastic collection grid system that has 95% void space for stormwater runoff; stormwater will accumulate and flow to a detention system constructed underneath the field. Water will be discharged from the detention system to the wetland and stream to the south, similar to existing conditions.	Section 3 (Water)
9	The proposed enhancement of Wetland A will not adequately mitigate for the buffer impacts.	Aagaard, Hendershott, Colton, Finley, Hirt, Mooney	The proposed ballfield improvements were designed to completely avoid impacts to Wetland A and forested portions of its buffer; buffer impacts are limited to a portion of the existing mowed grass ballfield. This mowed area currently provides limited habitat and water quality improvement functions. As mitigation for the loss of 37,932 square feet of mowed wetland buffer, the City will enhance approximately 55,000 square feet of existing, disturbed buffer and wetland area. Invasive vegetation will be removed from the enhancement areas and native herbs and shrubs will be installed, and the mitigation area will be protected in perpetuity. City code requires 5 years of monitoring for wetland mitigation projects (KMC 18.55.280), but the City will monitor the enhancement areas for 10 years to ensure the success of the plantings. Overall, the mitigation proposal will provide a greater diversity and density of native plants and increase the habitat value for native wildlife species, as compared to existing conditions.	Section 3 (Water)
10	The project will pollute the underground spring.	Hendrickson	There is no water spring located within the project vicinity; the ditch along the eastern side of the field appears to receive flows from the seasonally high water table. As stated above in the response to Comment # 6, no chemicals will be used on the synthetic turf field, and the turf infill will be an inert, non-toxic material. Crumb rubber infill (i.e. ground rubber from truck and automobile tires) will not be used.	Section 3 (Water)

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11	The existing grass field has ecological value; installation of artificial turf will affect soil microbial health, remove beneficial insects, and result in a loss of foraging habitat.	McKendry, Ratliff, Hendershott, Stokes, Carlson, Finley, Higuet, Hill, Slayden, Mooney	Impacts to soils will be limited to the footprint of the proposed synthetic turf field (approximately 3 acres). No chemicals or fertilizers will be used on the synthetic turf; surrounding soils and beneficial insects would not be significantly affected by the project. Removal of the existing sod would result in a minor loss of foraging habitat, although mowed grass is not considered to provide high-quality wildlife habitat. St. Edward Park contains approximately 310 acres of undeveloped habitat, most of which is forest; the project would disturb less than 1% of the total habitat within the park. Additionally, approximately 20 acres of mowed field habitat will remain in the park, adjacent to the seminary building and Bastyr University. To offset the loss of habitat provided by the mown field, enhancement plantings and other measures are proposed. The wetland and buffer enhancement, along with the native tree and shrub plantings proposed along the north side of the field, will provide a greater diversity and density of undisturbed native plant species in the vicinity. To further enhance wildlife habitat, the City will install nest and feeder boxes, as well as bat boxes in the project vicinity. The City will also remove invasive plant species such as English ivy and holly in the vicinity of the ball field to improve habitat conditions in adjacent undisturbed forested areas.	Section 4 (Plants) Section 5 (Animals)
12	Are red legged frogs present? If so, a Habitat Management Plan would be needed.	Aagaard, Hendershott, Hendrickson	Red legged frog has not been observed in the project vicinity. In 2006 and 2007, Washington Department of Natural Resources conducted an amphibian and reptile survey in St. Edward State Park; red legged frog were not observed anywhere in the park. Additionally, Washington Department of Fish and Wildlife (WDFW) Priority Habitat and Species (PHS) does not include any listings for red legged frog in the park.	Section 5 (Animals)
13	Artificial turf has a short replacement time, and is difficult to dispose of.	Higson, Hendershott, Colton, Prince	The synthetic turf product is expected to last at least 10 years. When the turf must be replaced, turf materials are recycled according to the requirements of the Resource Conservation and Recovery Act (RCRA) of the United States EPA. The recycling system is a heat and pressure extrusion method which processes 100% of the turf in whole, without separation. The residual product is reused in building products. The field infill material would be screened, cleaned, and reused.	Section 6 (Energy and Natural Resources) Section 7 (Environmental Health)
14	LED lights release Electromagnetic Field [EMF] pollution, which has negative health impacts.	Hendershott	An American Medical Association (AMA) report on LED lighting was released this year; the report focuses on the human and environmental effect of LED community lighting. The report also discusses environmental impacts of outdoor LED lighting, impacts of glare, visibility, and shielding. The AMA study focused on street lighting and other dusk to dawn lighting systems, and not sports lighting systems that operate for shorter periods of time under curfew. There are no current studies that specifically address the health effects of sports lighting. From an environmental and human health standpoint, the proposed LED field lighting system is designed to address many of the issues discussed in the AMA report, even though the report focuses on lighting that is used from dusk until dawn. The field floodlights are designed with high efficiency optics that deliver more light to the field and not into the surrounded community. Additional shielding will also be provided to further reduce light pollution, exposure to glare, and spill light.	Section 7 (Environmental Health)

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15	Artificial turf has not been sufficiently tested to insure that it is not toxic as a play surface.	Higson, Ericson, Gensler, Finn, Hirt, Prince, Gould	Crumb rubber infill, which is currently being tested by three federal agencies, is not proposed to be used. Prior to placement of the first synthetic turf field in unincorporated King County, water quality tests were conducted on an existing synthetic turf field in the City of Redmond at the downstream catch basin. Microtox and metals analyses were conducted. The study concluded that: 1) The water collected had no effect on test organisms; 2) No toxicity was detected in the water samples collected; and 3) Zinc and copper concentrations collected complied with state and federal water quality standards for drinking water.	Section 7 (Environmental Health)
16	Artificial turf can become very hot on sunny days; fields cause more injuries.	Stokes, Colton	Synthetic turf absorbs solar energy faster than grass, which can cause turf fields to become hotter during sunny weather. In general, heat increases from turf are less of a concern in mild climates such as the Puget Sound region, as opposed to regions that experience high temperatures (such as Las Vegas). Additionally, because the field is surrounded by forest habitat, the hours per day that the field would be exposed to direct sunlight area limited. The proposal also includes covered dugouts, which allow players to remain in the shade when not active. Studies of injuries related to playing surfaces as early as 1998 indicates that there are fewer injuries on synthetic turf than on natural grass. This is due in part to the potential for irregular surfaces on natural grass affected by poor maintenance, whereas the synthetic turf surface remains uniform throughout its life. The proposed synthetic turf will include a shock pad which will also maintain a consistent GMX (hardness), whereas for high use areas of natural grass, a field can become extremely dense (hard) in heavy use areas.	Section 7 (Environmental Health)
17	The project will cause an increase in noise (from traffic, game play, cheering, PA system), and noise will occur at times when the park does not currently experience noise.	McKendry, Hendershott, Stokes, Carlson, Finley, Prince, Mooney	An increase in noise is likely to occur when the field is in use and during maintenance operations. Currently, field use is limited to the daytime; installation of the field lighting could extend field use hours to no later than 9 pm. Noise produced by field usage will comply with the City's noise standards (KMC Chapter 8.05). The distance between the ballfields and nearby residences will further limit noise impacts; the nearest residences (Bastyr University student village) are located over 800 feet away and the nearest single-family residences are located over 1,000 away. The proposed planting of native trees and shrubs along the north side of the field will further help to reduce noise impacts to the immediate area. The proposed ballfield improvement project does not include the installation of a public address system.	Section 7 (Environmental Health)
18	The proposal results in too much light, which will affect animals and cause night sky impacts.	Aagaard, McKendry, Ratliff, Hendershott, Stokes, Carlson, Finley, Higuet, Prince, Mooney	The proposed field lighting could affect wildlife immediately adjacent to the field area. Crepuscular (active at twilight) and nocturnal (active at night) species can be disoriented by artificial lights, and may be attracted to or repulsed by light, which could affect foraging, reproduction, communication, and other behaviors. Several mitigation measures are proposed to minimize lighting impacts to artificial light-sensitive species and reduce night sky impacts. These measures include: limiting the use of lighting to no earlier than 3pm to no later than 9pm; using lighting only during scheduled gameplay; using the latest LED lighting technology to reduce the impact of glare and spill light; installation of native tree and shrub species to buffer field lighting from the rest of the park; and installing lighting as close to the field as possible. Additionally, bat boxes will be installed in the vicinity to enhance bat habitat in the area.	Section 5 (Animals) Section 11 (Light and Glare)

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19	The project will result in loss of use by the general public, and artificial turf is not desirable for pick-up games, tag, picnics, sunbathing, etc.	Leon, McKendry, Ratliff, Hendershott, Carlson, Colton, Prince, Gould	The proposed project will not displace existing recreational uses; the field will continue to be used for a variety of organized and unorganized recreational events. The lease agreement with State Parks will specify that open, unscheduled play continues on the field. There are approximately 10 acres of mowed grass fields that surround the seminary building, which are available for park users to play tag, sunbathe, etc.	Section 12 (Recreation)
20	The proposed field would be too small for adult games.	Colton	The size of the proposed field is based upon the existing footprint and current uses, and is sized to avoid wetland impacts. While the field will contain 2 youth-sized soccer fields, it would be large enough to accommodate 1 adult-sized soccer field. Additionally, there would be no restriction on adult use of the fields for pickup games, informal recreational leagues, etc.	Section 12 (Recreation)
21	The project will displace existing recreational users, such as the cricket club and the Wilderness Awareness School.	Gerrish, McKendry, Hendershott, Carlson, Colton, Finley, Finn, Prince	The City met with representatives of Olympic Cricket Club and Northwest Cricket League on July 26, 2016, to confirm the City's commitment to maintaining the same access to the facility as they have currently. City staff evaluated potential schedules for Little League and Northshore Youth Soccer based upon maintaining the club's current (2016) schedule of both practices and games. Cricket club members confirmed that amateur clubs can play on synthetic turf. The Olympic Cricket Club submitted two emails during the City's Imagine Kenmore public outreach project in September and October 2015 strongly supporting upgrading Saint Edward's field. The club followed up with a letter of support for the project on April 17, 2016 before learning of the synthetic turf component of the proposal. The club then submitted a letter on May 31, 2016 withdrawing support for the renovation based upon the proposed synthetic turf component. At the July meeting with City staff, club members clarified that the letter was submitted out of concern that the City might not let the club use the field if it was synthetic turf because of the potential for damage by balls. The City followed up on the concerns expressed in July by cricket players that synthetic turf would sustain significant damage from cricket balls, and is satisfied by the results of its research which indicate that the proposed turf will sustain anticipated levels of play by all proposed leagues, including cricket, without undue wear. The product is warranted for cricket use. Synthetic turf has been in use for years in the U.S. by cricket clubs, including the Olympic Cricket Club's prior use of Microsoft's synthetic turf field. Turf is noted for its playability even after heavy rains that would close a grass field. The proposed renovation will result in an improved pitch for cricket than exists currently at Saint Edward. The City looks forward to supporting continued cricket league use while also providing much needed game-quality fields for baseball, soccer, and other ball sports. The proposal will not preclude use of the field by the Wilderness Awareness School. The majority of the Wilderness Awareness School programs at St Edward State Park occur on weekdays from 9 to 3 pm, while Little League and soccer practices do not start until 3:30pm on weekdays.	Section 12 (Recreation)
22	How will the project affect the summer concert series and the other festivals that occur in the park? Will the field still be available for overflow parking?	Gerrish, Ratliff, Lance, Hendershott	The City and State occasionally host special events that utilize the ballfields for parking. The improved ballfields will not be used for parking. Instead, some events could take place on the ballfields with parking moved to the field behind the seminary, where events occur today. Washington State Parks will work with event organizers and consider alternatives for event space and facilities on a case-by-case basis.	Section 12 (Recreation)

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23	The artificial turf field and permanent markings/lines would have negative aesthetic impacts to the park, and the field structures would block open views.	Aagaard, Leon, McKendry, Carlson, Colton, Finley, Finn, Prince	The proposal will result in a higher level of development to the field, which will alter the aesthetics of the area. In coordination with Washington State Parks, the City will be implementing several mitigation measures to lessen potential aesthetic impacts. Mitigation measures to be utilized include using a turf color (such as a muted green) that blends into the natural context of the site; painting the light poles, bleachers, and backstops in dark green or brown; and establishing a mix of native conifers and evergreen shrubs along the north side of the field to partially screen the improved field. Other mitigation measures being considered include reducing the height of the backstops from 28 feet to 24 feet and using alternative backstop materials, such as netting, that could minimize the appearance of the backstops.	Section 13 (Historic and Cultural Preservation)
24	The proposed 45 cedar trees would block the historic view of the ballfield.	Aagaard, Finley, Finn	City staff met with representatives of Washington State Parks on-site to address the impact of the proposed trees on the views of the ballfield. The landscape plan will be revised to eliminate the solid row of trees and to retain some views of the ballfield.	Section 13 (Historic and Cultural Preservation)
25	The two-day parking study is inadequate, and the study doesn't address that soccer teams are bigger than baseball teams. Additionally, parking is over-capacity beyond just Saturdays.	Lance, Hendershott, Carlson, Finley	It is standard practice to perform parking studies based on one day of parking and traffic data, so long as the day selected represents typical conditions. The parking study was conducted on one weekday and one weekend day during May 2016. This month was selected for the parking study, as it represents a peak use period for parking at St. Edward and Bastyr University – with school in session and assorted activities occurring at the park. The weekday was an average weekday with good weather. The Saturday chosen was an above average busy day, with a wedding, a bike race, and good weather. The parking study assumed that 75 percent of parents will stay to watch the game, and that coaches and referees are parents. This would result in 18 parked cars per game. Assuming there are two concurrent games, room for 36 parked cars would be required. While the parking study shows that there is sufficient space on weekdays, weekends may be over-capacity with the existing parking supply. The City plans to add 19 additional parking spaces at the park through paving over gravel areas and restriping. The additional parking provided by the City is expected to be sufficient to accommodate the additional parking demand related to two concurrent baseball games on weekends. The weekday parking assessment was completed on an average Tuesday with basketball practice at the seminary. Parking spaces were 23 percent utilized. While parking is not always available directly in front of the proposed ballfields, there are over 100 additional parking spaces available north of the seminary. The parking study recommended that signs be added directing visitors to these additional parking spaces. While adult soccer teams may be bigger than baseball teams, the field can only host one adult soccer game at a time, but two baseball games concurrently. The field can, however, host two youth soccer games concurrently. The youth soccer teams tend to have about 10 players each with coaches and referees. Two concurrent baseball games include 48 players, 8 coaches, and 2 umpires. Two concurrent youth soccer games are expected to have 40 players, 8 coaches, and 2 referees. Therefore, a parking and traffic study for two concurrent baseball games is the worst case scenario from both a parking and traffic impact perspective. The proposed Lodge at St. Edward would be required to provide parking for all the guests and visitors, according to parking standards set by the City of Kenmore. Guests and visitors to the hotel will not use the existing parking provided in the park.	Section 14 (Transportation)

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26	Need to assess parking requirements during baseball and soccer tournaments.	Lance, Finley	Baseball and soccer tournaments will be scheduled with discretion from the City. Sufficient parking and field capacity are important criteria that the City will consider before scheduling a tournament. If the City determines there is not enough parking available for a tournament, other options will be considered, including shuttling.	Section 14 (Transportation)
27	The proposal will generate too much traffic.	Ratliff, Hendershott, Carlson, Finley, Prince	The proposal will generate additional traffic; however, the existing roadways and signals are adequate to handle the expected increase. The trip generation analysis was based on a worst-case scenario of two games ending and two games beginning within the same hour. To be conservative, it was assumed that there is no carpooling among coaches, players, or referees. It was also assumed that some parents do not stay to watch the game, which creates more vehicle trips into and out of the park. This conservative analysis results in 192 peak hour vehicle trips into and out of the park (96 in and 96 out). This is the maximum one hour trip generation for weekday and weekend. The traffic analysis showed the added trips to the park entrance intersection will increase delay at the intersection of NE 145th Street and Juanita Drive NE by about 11 seconds per vehicle, but the delay can be mitigated by updating the signal timing. The expected Level of Service (LOS) of the intersection with the added trips meets the City's standard. Furthermore, the City of Kenmore has planned for this level of development. The recently added traffic signal provides the highest level of safe site access. In general, an increase in traffic increases the likelihood of a collision. However, the roads in St. Edward State Park are low speed with no history of collisions. We would not expect the increase in traffic to increase collisions with the added traffic from the ballfields.	Section 14 (Transportation)
28	The traffic study does not factor in impacts from players who arrive before games to warm up.	Lance	The traffic analysis is conservative to assume that two games end and two games begin within the same hour, and all trips relating to the four games were assumed to travel through the intersection in the same hour. The parking study looks at the impact of two concurrent games, and assumes that parking clears out between sets of games. Scheduling can be used to minimize any overlap between two sets of games ending and beginning.	Section 14 (Transportation)
29	The cumulative impacts of traffic and parking from the hotel proposal must be assessed.	Lance, Carlson, Finley, Prince	The "Future, No Project" and the "Future, Plus Project" scenarios included project trips from the proposed Lodge at St. Edward Park. According to the Draft EIS for the Lodge at St. Edward Project, the applicant for the lodge proposal would construct additional parking spaces to serve the lodge, which would result in no net change to parking supply for the park.	Section 14 (Transportation)

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30	There are inadequate bathroom facilities for more intensive use of the ballfield.	Ratliff, Hendershott	The existing restrooms near the ballfield contain 2 toilets and 1 urinal for men, and 3 toilets for women. Based upon the Building Code plumbing table, only 1 toilet would be needed for men and 2 toilets for women, assuming 100-150 persons are in attendance at the ballfields (2 coaches, 24 players, 1 umpire, 48 spectators times 2 fields, split in half between men/women). Therefore, the existing facilities are adequate to accommodate both the ballfield and park use, given that there are other bathroom facilities in the park and that the ballfields currently are in use with no issues raised. In the case of a special event at the park and/or the ballfield, facility adequacy would be assessed and Washington State Parks and/or the City could consider bringing in temporary portable toilets. This is what the City does for the summer concert series where 3 portable toilets are provided for the approximately 500-1000 attendees, as the existing bathrooms are too far away for easy use.	Section 16 (Utilities)